

April 3, 2014

COPY

Davidson-Kennedy Company
c/o Mr. Joseph H. Rubin
5273 Redfield Road
Dunwoody, Georgia 30338

RE: 4th Semi-Annual VIRP Progress Report, June 2013
5th Semi-Annual VIRP Progress Report, December 2013
Davidson-Kennedy Company Property, HSI Site No. 10866
1195 Victory Drive, Atlanta, Fulton County, Georgia
Tax Parcel 14-0121-0007-002-4

Dear Mr. Rubin:

The Georgia Environmental Protection Division (EPD) has reviewed the June 2013 and December 2013 Progress Reports submitted for the above referenced Site pursuant to the Georgia Voluntary Remediation Program Act (the Act). We also reviewed the December 27, 2013 Response to EPD's June 12, 2013 comments, in regards to the kriging analysis. EPD's comments are provided below and should be addressed in accordance with the Act:

1. EPD concurs that soil and groundwater delineation on the Davidson Kennedy Company site is complete in accordance with Item # 5.b. and 5.c. of the Voluntary Remediation Program Application (VRP) checklist, and based on the groundwater exemption of Section 12-8-107(g)(2) of the Act.
2. The December 27, 2013 letter has satisfactorily addressed EPD's questions regarding the geostatistical soil evaluation. We concur with the proposed area averaging approach and the goal of an average lead concentration of less than 400 mg/kg in each exposure domain. Confirmation samples should be collected post-excavation and the results evaluated to confirm that the goal has been achieved and that the most heavily impacted areas have been removed.
3. EPD concurs that the area northeast of the Davidson Kennedy property, between the property line and the creek, contains historic fill material. Therefore, EPD will contact the owner of that property to address the lead impacts on their property.
4. Section 4.0 of the December 2013 progress report notes specific soil locations impacted with PAHs above the Type 1 risk reduction standard (RRS), which are proposed to be excavated. The default Type 4 RRS for benzo(a)pyrene is 7.8 mg/kg (assuming a DAF of 20 since it was not detected in groundwater). Since the property will be restricted to non-residential use, it appears that DK-10 and SB-5 may be the only soil sample points that exceed Type 4 RRS for PAHs.
5. EPD received the ecological preliminary risk evaluation submitted on March 14, 2014, and will review this document and provide comments under separate cover.

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Davidson-Kennedy Company must address these comments to EPD's satisfaction in order to demonstrate compliance with the provisions, purposes, standards and policies of the Act. EPD may, at its sole discretion, review and comment on documents submitted by Davidson-Kennedy Company. However, failure of EPD to respond to a submittal within any timeframe does not relieve Davidson-Kennedy Company from complying with the provisions, purposes, standards and policies of the Act.

The next progress report, due June 30, 2014, should finalize the remediation plan and provide a cost estimate for implementation of remediation and associated continuing actions. If you have any questions, please contact John Maddox of the Response and Remediation Program at (404) 657-8600.

Sincerely,



Charles D. Williams
Program Manager
Response and Remediation Program

C: John P. Martinieri Jr., P.E. – Peachtree Environmental

File: HSI #10866

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